John H. Robinson, WSB # 6-2828 JAMIESON & ROBINSON, LLC 214 South Grant Street Casper, Wyoming 82601 307.235.3575 307.577.9435 FAX robinsn@vcn.com

Counsel for Plaintiff Flores

Theodore R. Racines Wyoming Attorney General's Office 123 Capitol Building Cheyenne, WY 82002 Telephone: 307.777-7862

Fax: 307.777-8920 torey.racines@nyo.gov

Counsel for Defendant Menig

## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF WYOMING

JUAN PAUL FLORES,	)	
Plaintiff,	) ) Civil Case No.	14-CV-184-S
VS.	) CIVII Cuse IVO.	11 6 7 101 5
GEORGE MENIG,	)	
Defendant.	)	

## STIPULATED MOTION TO EXTEND EXPERT WITNESS DESIGNATIONS

The parties hereto, by and through their respective undersigned counsel of record, hereby jointly stipulate and move the Court for an Order vacating and extending their expert witness designations, for the reasons stated herein.

Plaintiff initially served a *Subpoena Duces Tecum* on The City of Cody and The Cody Police Department on February 17, 2015, for documents, internal records, materials and relevant evidence relating to the arrest of the Plaintiff in September 2010. Plaintiff's counsel had several discussions with counsel for The City of Cody and The Cody Police Department regarding those requested documents, internal records, materials and relevant evidence, and in March, served an *Amended Subpoena Duces Tecum* on The City of Cody and The Cody Police Department. Counsel for the Plaintiff agreed that the time frame within which to respond to the amended subpoena could be extended to allow The City of Cody and The Cody Police Department ample time to gather all such requested materials. To date, those requested documents, internal records, materials and relevant evidence has not been received by Plaintiff's counsel.

The materials requested will need to be reviewed by Plaintiff's expert witness(es) in order for the expert to culminate his opinions, and the basis of his opinions. The parties agree, and stipulate, to a 60-day extension within which to list their expert witnesses.

WHEREFORE, the parties jointly request that the Court enter an Order vacating and extending the parties' expert witness designations, as follows:

- Plaintiff's Expert Witness Designation deadline to be moved from April 27,
   2014 to June 26, 2015.
- Defendants' Expert Witness Designation deadline to be moved from May 27,
   2015 to July 26, 2015.

## RESPECTFULLY SUBMITTED this 20<sup>th</sup> day of April 2015.

\_\_\_\_\_/SS/\_\_\_\_ By: John H. Robinson, WSB # 6-2828 JAMIESON & ROBINSON, LLC 185 W. Broadway P. O. Box 4285 Jackson, Wyoming 83001 307.733-7703 Fax: 307.577.9435 robinsn@vcn.com \_\_\_\_/SS/\_\_\_\_ By: Theodore R. Racines Wyoming Attorney General's Office 123 Capitol Building Cheyenne, WY 82002

torey.racines@wyo.gov